

## **PERMIT CONDITIONS**

EMCO Recycling Corp.

Permit Number 96-0669

July 31, 1997

*The numerical section references in this Permit are based on Maricopa County Air Pollution Control Rules and Regulations (Rules) in effect on the date of issuance of these Permit Conditions. In the event that these rules are revised to change the numerical references during the term of this Permit, the revised numbering system will apply to this permit.*

### **GENERAL CONDITIONS:**

1. **Annual Compliance Certification:** The Permittee shall file an annual compliance certification with the Maricopa County Department of Environmental Services (Department), Attn: Air Quality Compliance Supervisor. The compliance certification shall be filed on a form and in the manner specified by the Maricopa County Air Pollution Control Officer (Control Officer).
2. **Certification:** Any document which is required to be submitted by this Permit or the Rules shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
3. **Controls:** Except as provided by the applicable Rules or these Permit Conditions, the Permittee shall not operate any equipment or process unless air pollution controls, required by either this Permit or the Rules, are in place, are operating without bypass, and are operating within their design parameters and in accordance with any other conditions specified in this Permit. This requirement to operate any required air pollution control equipment may be temporarily waived:
  - a. for good cause if advanced written approval is obtained from the Control Officer, or
  - b. for preventative maintenance of the control device if the shutdown is allowed in the control's Operation and Maintenance Plan which has been approved in writing by the Control Officer.

The Permittee shall notify the Control Officer, in accordance with Rule 220, before making any additions, modifications or replacements to any air pollution control equipment. This notification requirement does not apply to normal maintenance and repair activities.
4. **Fees:** The Permittee shall pay, in a timely manner, an annual fee for this Permit as determined by the Control Officer in accordance with Rule 280.
5. **Fugitive Dust:** The Permittee shall take all reasonable precautions to minimize the emissions of fugitive dust in accordance with §300 of Rule 310.

6. **Leased/Rented/Borrowed Equipment:** If the Permittee leases, rents, or lends any equipment covered by this permit to a second party, the Permittee shall provide the second party with a copy of this Permit. It is the responsibility of the person using the equipment to make sure that the equipment is properly permitted and operated. If the Permittee does not provide the second party with a copy of this Permit, both the Permittee and the second party shall be responsible for operating the source in compliance with the Permit and for any violation thereof.
7. **Maintenance:** The Permittee shall keep all equipment under this Permit in good working order through an active maintenance program established in accordance with the approved Operation and Maintenance Plans or, in its absence, with manufacturers' recommendations, and generally accepted industry standards.
8. **Malfunctions (Emergency Upsets):** A malfunction that causes emissions in excess of those allowable by either the Rules or these Permit Conditions shall constitute a violation. Any affirmative defense of a violation caused by a malfunction shall be documented in accordance with §501 of Rule 100.
9. **Material Containment:** Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.
10. **Modifications:** The Permittee shall notify the Control Officer, in accordance with the Rules, of changes, replacements or additions to the source which are not covered by this Permit.
11. **Odors:** The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.
12. **Operations:** The Permittee shall operate all equipment and processes in accordance with these Permit Conditions, applicable approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.  
The Permittee shall halt or reduce activities if necessary in order to maintain compliance with these Permit Conditions, all approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.
13. **Portable Sources:** If this Permit is for a portable source, the Permittee shall notify this Department, Attn: Air Quality Compliance Supervisor, in writing at least ten days in advance of moving to any location in Maricopa County. The notification shall include, at a minimum, the information required by §410 of Rule 200.

If the proposed location will have additional sources of air pollution under the control of the Permittee, the notification shall also contain a summary of the projected and allowable emissions for these additional sources.

The ten day notification requirement may be waived if both of the following conditions are met:

- a. the Permittee can demonstrate to the satisfaction of the Control Officer that an emergency situation existed, and
- b. the Permittee notifies the Department of the required information by telephone as soon as is practical and follows up with a written copy within seven days.

The Permittee shall submit any fees required by Rule 280 at the time that the notification is filed.

If the Permittee obtains an air quality permit from the Arizona Department of Environmental Quality (ADEQ) for any source covered by this Permit, the Permittee shall provide a copy of the ADEQ permit to the Department within 30 days of its issue.

14. **Record Keeping:** The Permittee shall maintain accurate records as required by these Permit Conditions and by Section 500 of all applicable Rules. These records will be kept in a form which allows easy verification of compliance with these Permit Conditions and any applicable Rules.

All records shall be kept for a minimum of three years except that all records required to demonstrate that an air pollution control device is being operated properly shall be retained for five years.

All records required by this Permit shall be made available for inspection upon request by a representative of the Control Officer.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this permit.

15. **Renewal:** The Permittee shall file an application for a permit renewal at least six months, but not more than 18 months, before the expiration date of this Permit.

16. **Reopening For Cause:** This Permit shall be reopened or revised prior to expiration under any of the following conditions:
  - a. either the Control Officer or the Administrator of the United States Environmental Protection Agency (Administrator) determines that this Permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of this Permit, or
  - b. either the Control Officer or Administrator determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.

17. **Reporting:** If notified, the Permittee shall submit an annual emissions inventory report to the Control Officer. The report shall summarize the activities and air pollution emissions from the facility during the previous calendar year in accordance with §507 of Rule 100. The report shall be filed on a form supplied by the Control Officer and shall be due by April 30 or 90 days after the Control Officer makes the forms available, whichever is later.

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising or revoking and reissuing this Permit or to determine compliance with this Permit.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this Permit.

The Permittee shall file any additional reports required by the Control Officer in a complete and timely manner.

18. **Right to Entry:** The authorized representative of the Control Officer, upon presentation of credentials, shall be permitted:
- a. to enter upon the premises where the source is located or emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this Permit, and
  - b. to have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this Permit, and
  - c. to inspect any source, at reasonable times, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required in this Permit, and
  - d. to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements, and
  - e. to record any inspection by use of written, electronic, magnetic, and photographic media.

No claim of confidentiality for trade secrets or commercial information available to the Permittee under Arizona Revised Statutes (ARS) 49-487 or Rule 200 §400 can limit the scope of or otherwise interfere with an on-site inspection by a representative of the Control Officer.

19. **Rights and Privileges:** This Permit does not convey any property rights nor exclusive privileges of any sort.
20. **Severability:** The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.
21. **Start-up Notification:** The Permittee shall give written notification to the Department, Attention Compliance Supervisor, at least 7 days but no more than 30 days before the initial start-up of any new equipment or process. Start-up shall be defined as the use of any equipment or process covered by this Permit in a manner that emits or controls a regulated air pollutant. However, startup shall not be considered as having occurred if the equipment or process is operated solely for the purpose of calibration or test runs.

This startup notification does not apply to processes or equipment recognized by the Control Officer as being trivial or insignificant activities.

22. **Temporary Equipment:** The Permittee shall notify the Control Officer and obtain appropriate approval, in accordance with the Rules, prior to the installation or operation of any temporary or contractor operated equipment not covered by this Permit.

**SPECIFIC CONDITIONS:**

23. **Allowable Emissions (Entire Source):** The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Daily Emission Limits	Twelve Month Rolling Average Emission Limits
Carbon Monoxide (CO)	4.25 pounds	1500 pounds
Oxides of Nitrogen (NO <sub>x</sub> )	20 pounds	3.5 tons
Oxides of Sulfur (SO <sub>x</sub> )	1.5 pounds	510 pounds
Total Particulate Matter (PM), Including PM <sub>10</sub>	20 pounds	3.5 tons
Total Volatile Organic Compounds (VOC)	12 pounds	2.0 tons

The twelve month rolling average shall be calculated at the end of each calendar month by summing the emissions over the most recent twelve calendar months.

**“Newell 60-104” Hammer Mill Metal Shredder (Shredder)**

24. **Operations and Maintenance Plan (O&M Plan):** The Permittee shall provide the Department with an approvable O&M Plan for the “Newell 60-104” hammer mill metal shredder. The O&M Plan shall be prepared in accordance with the Department’s guidelines and submitted to the Compliance Manager of this Department’s Field Services Division within 30 days after submittal of the performance test results as specified in Condition #29. This O&M Plan shall reflect the operating conditions of the shredder during those performance tests that demonstrated compliance.
25. **Operating Requirements:**
- The Permittee shall limit the type of materials fed into the shredder to scrap motor vehicles and miscellaneous metal scrap. Scrap materials loaded into the shredder shall not contain any significant quantities of fuels, oil, grease, bituminous substances or other similar substances capable of volatilizing during the shredding process. Lead containing batteries, wheel balancing weights and other lead containing materials shall not be processed in the shredder.

- b. The Permittee shall operate the shredder in such a manner so as not to discharge into the atmosphere emissions of any air contaminants other than uncombined water vapor of a shade or density darker than 20% opacity. The opacity determination shall be made in accordance with U.S.E.P.A. Method 9 observation requirements.
- c. The Permittee shall not operate the "Newell 60-104" hammer mill shredder without maintaining a minimum water flow rate of 10 gallons per minute to the spray bar at the inlet end of the shredder hopper. If during performance testing, as outlined in Condition #29, another flow rate is determined to be the rate that is effective in controlling emissions of particulate matter, the Permittee shall submit a permit revision application reflecting the modified water flow rate. This permit revision application shall be submitted within 30 days of receipt of the final performance test report.
- d. When operating the "Newell 60-104" hammer mill shredder, the Permittee shall document continuously the flow of water to the inlet hopper by utilizing a water flow meter connected to an accurately calibrated chart recorder. These water flow charts shall be appropriately labeled with dates and times of operation of the shredder and the inlet hopper spray bar.
- e. The permittee shall exhaust all emissions from the "Newell 60-104" hammer mill shredder through the cyclone separator control device and/or other properly functional dust collection unit(s). A properly functional dust collection unit shall be defined as having a control efficiency of at least 85% by weight for particulate matter.
- f. The Permittee shall operate and maintain the dust collection unit(s) in accordance with the approved O&M Plan.
- g. The Permittee shall not operate the "Newell 60-104" hammer mill shredder unless the cyclone separator control device is operating and in proper working order.



26. **Process Weight Rate Limit:** The Permittee shall limit metal scrap process weight throughput for the "Newell 60-104" hammer mill shredder to a maximum of 35 tons per hour. This process rate shall not be exceeded, unless, during performance testing as outlined in Condition #29, another process rate is determined to be the rate that is effective in controlling emissions of particulate matter. The Permittee shall submit a permit revision reflecting this modified process weight throughput within 30 days of receipt of the final performance test report.
27. **Record Keeping:** The Permittee shall keep daily usage records of all materials processed by the "Newell 60-104" hammer mill shredder. The weight of metal processed daily may be determined by dividing the weight of metal processed weekly by the number of days worked per week. These records and the water flow charts for the shredder inlet hopper spray bar shall be made available for immediate inspection by Department personnel upon request.
28. **Training:** The Permittee shall fully train all individuals before they are allowed to operate the "Newell 60-104" hammer mill shredder system. Training shall include, but not necessarily be limited to:
- a. Thorough instruction regarding the operating parameters of the shredder system and the associated emissions control device(s).
  - b. Instruction involving any limitations on the quantity of and types of (proportionately) scrap metal processed on an hourly basis.
29. **Testing:**
- a. The Permittee shall conduct performance testing on the "Newell 60-104" hammer mill shredder within 60 days after the issuance of this permit. This time frame may be extended by the Control Officer for good cause, but in no case shall the testing period extend for more than 180 days after the issuance of this permit. Testing shall be performed for particulate matter and total lead (Pb) compounds and shall be conducted with the shredder operating at the maximum process weight rate specified in Permit Condition #26 unless the Permittee requests and is granted permission from the Department to operate at a higher rate for performance testing purposes.. During testing, the type of and percentage of different materials processed by the shredder shall be similar to those which the Permittee intends to process during typical business operations. The testing shall be conducted in accordance with appropriate USEPA approved test procedures.
  - b. This test shall determine the optimum water flow rate in controlling emissions of particulate matter as well as demonstrate that the cyclone separator control device can achieve an 85% by weight control efficiency for total particulate matter.

- c. The Permittee shall submit a test protocol to the Department Source Test Compliance Section for review and approval at least 30 days prior to the emissions test. A fee for each stack to be tested, as required by Rule 280, shall be submitted with the test protocol.
- d. The Permittee shall notify the Department in writing at least two weeks in advance of the actual time and date of the emissions test so that the Department may have a representative attend.
- e. The Permittee shall complete and submit a report to the Department within 30 days after completion of the emissions test. The report shall summarize the results of the testing in sufficient detail to allow a compliance determination to be made.

### **Gasoline Storage Tank**

- 30.
  - a. Allowable Emissions: The Permittee shall not allow emissions of VOCs into the atmosphere from the gasoline storage and vehicle fueling operations to exceed 600 pounds per month nor more than 2,400 pounds per year.
  - b. Allowable Throughput: The Permittee shall limit gasoline throughput to less than 30,000 gallons per month and less than 120,000 gallons per year.
  - c. Control Parameters: The Permittee shall not allow gasoline to be transferred into the storage tank unless the storage tank is equipped with a fill pipe, the end of which is totally submerged when the liquid in the tank is six inches from the bottom of the tank.
  - d. Record Keeping: The Permittee shall maintain accurate records showing the quantity of all gasoline delivered to the facility and shall record the total received during each month.

### **General**

- 31. **VOC Containment And Disposal:** The Permittee shall not store, discard, or dispose of VOCs or VOC-containing materials in a way intended to cause or to allow the evaporation of VOCs to the atmosphere. Reasonable measures shall be taken to prevent such evaporation which include but are not limited to the following:
  - a. All materials from which VOCs can evaporate, including fresh solvent, waste solvent and solvent-soaked rags and residues, shall be stored in closed containers when not in use.
  - b. Such containers one gallon and larger shall be legibly labelled describing their contents.
  - c. Records of the disposal/recovery of such materials shall be kept. Records of hazardous waste disposal shall be kept in accordance with hazardous waste disposal statutes.
- 32. **Dust Control Plan:** The Permittee shall submit an approvable dust control plan within 30 days of issuance of the permit. The dust control plan shall contain at a minimum all information required in Section 401 of Rule 310 of Maricopa County Air Pollution Control Regulations.
- 33. **Fugitive Dust Control:** Water, chemical dust suppressants and/or other reasonable control measures for particulate matter shall be used on all haul roads, unpaved

parking areas, storage piles, transfer operations and any other source of fugitive emissions of particulate matter. These control measures shall be implemented in such a way as to effectively prevent fugitive emissions of particulate matter from violating visible emissions standards. Effluent discharge from any control device shall not be used for dust control purposes unless approval is provided to the Department, in writing, from the Arizona Department of Environmental Quality.